

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

RECEIVED

SONIA R. HAMMOCK,) 2001 OCT -5 A 9:50
)
 Plaintiff,) DEBRA P. HACKETT, CLERK
) U.S. DISTRICT COURT
) MIDDLE DISTRICT ALA
 v.) Civil Action Number:
) 2:07cv896-wha
 NELL E. LAMB and TODD SWING,)
 et al.,)
)
 Defendants.)

ANSWER OF DEFENDANT, NELL E. LAMB ("LAMB")

First Defense

Lamb denies each and every material allegation of the complaint. She demands strict proof thereof.

Second Defense

Lamb specifically denies that she was guilty of any wantonness as alleged in the complaint. She denies that she was guilty of the type conduct required for the imposition of punitive damages under Alabama law. She demands clear and convincing evidence of such wrongful conduct.

Third Defense

Lamb denies that the plaintiff is entitled to recover the items and amounts of damages alleged in the complaint. She demands strict proof thereof.

Fourth Defense

Lamb reserves the right to amend her answer to raise additional or different defenses upon completion of further investigation and discovery.

R. Larry Bradford

R. Larry Bradford, Attorney for Defendant,
Nell E. Lamb
Attorney Bar Code: ASB-8038-F64R

OF COUNSEL:

Bradford & Sears, P.C.
2020 Canyon Road
Suite 100
Birmingham, AL 35216
(205) 871-7733

CERTIFICATE OF SERVICE

I hereby certify that I have this the 28 day of September, 2007 served a copy of the foregoing to all attorneys of record by electronically filing and/or placing a copy of same in the United States Mail, postage prepaid and properly addressed as follows:

Tedford Taylor, Esq.
Taylor & Taylor
2130 Highland Avenue
Birmingham, AL 35205

R. Larry Bradford

OF COUNSEL